

BINDER &
SCHWARTZ

Eric B. Fisher

Binder & Schwartz LLP

366 Madison Avenue, 6th Floor, New York, NY 10017

Tel 212.510.7031 Fax 212.510.7299

efisher@binderschwartz.com

July 15, 2016

By ECF and Email

The Honorable Martin Glenn
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Courtroom 523
New York, New York 10004

Re: *In re: Motors Liquidation Company*, Case No. 09-50026 (MG)

Dear Judge Glenn:

We represent the Motors Liquidation Company Avoidance Action Trust (the “**Avoidance Action Trust**”) in the above-referenced proceeding. On June 23, 2016, the Avoidance Action Trust filed a Motion for Entry of Order Pursuant to Sections 105 and 1142 of the Bankruptcy Code and Bankruptcy Rule 3020(d) Approving Litigation Funding Agreement (the “**Private Funding Motion**”) [Bankr Dkt. Nos. 13649, 13650 & 13651], currently scheduled to be heard by the Court on Monday, July 18, 2016, at 10:00 a.m. We write to inform the Court that the Avoidance Action Trust hereby withdraws the Private Funding Motion because it has been superseded by the motion filed today by the Avoidance Action Trust [Bankr. Dkt. Nos. 13687, 13688 & 13689] seeking, *inter alia*, approval of a litigation cost advance to the Avoidance Action Trust from the United States Department of the Treasury and Export Development Canada, which motion is scheduled to be heard at 10:00 a.m. on August 5, 2016.

The Avoidance Action Trust will be before the court at 10:00 a.m. on Monday, July 18, 2016, in connection with its Motion for Entry of an Order Extending the Duration of the Avoidance Action Trust [Bankr. Dkt. Nos. 13636 & 13637], and will be available to address any questions the Court may have regarding the withdrawal of the Private Funding Motion.

Respectfully,

/s/Eric B. Fisher

Eric B. Fisher

cc: Counsel of Record (by ECF)